

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

UNITED STATES OF AMERICA	§	
	§	
v.	§	NO. 4:14cr30
	§	Judge Schell
LAQUITA LASHAN MATHIS	§	

**ELEMENTS OF THE OFFENSE**

Count One- Five

18 U.S.C. § 844(e) makes it a crime for any person who through the use of the mail, telephone, telegraph, or other instrument of interstate or foreign commerce, or in or affecting interstate or foreign commerce, willfully makes any threat, or maliciously conveys false information knowing the same to be false, concerning an attempt or alleged attempt being made, or to be made, to kill, injure, or intimidate any individual or unlawfully to damage or destroy any building, vehicle, or other real or personal property by means of fire or an explosive. For the defendant to be found guilty of this crime, the government must prove each of the following elements beyond a reasonable doubt:

*First:* That the defendant through the use of mail, telephone, telegraph, or other instrument of interstate or foreign commerce;

*Second:* Maliciously conveyed false information;

*Third:* In and affecting interstate or foreign commerce;

*Fourth:* Knowing it to be false;

*Fifth:* Concerning an attempt or alleged attempt being made, or to be made  
a. To kill, injure, or intimidate any individual; or

- b. Unlawfully to damage or destroy any building, vehicle, or other real or personal property;

*Sixth:* By means of fire or explosive

Respectfully submitted,

JOHN M. BALES  
United States Attorney

\_\_\_\_\_/s/\_\_\_\_\_  
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Certificate of Service

I hereby certify a true and correct copy of the foregoing was served by electronic filing by CM/ECF to Frank Henderson, counsel for the defendant, on this the 8th day of April, 2014.

\_\_\_\_\_/s/\_\_\_\_\_  
M. Andrew Stover